



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

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NWIRP CALVERTON NY
5090.3a

SEP 20 1995

Mr. James Colter
Remedial Project Manager
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Mail Stop, #82
Lester, Pa. 19113-2090

Re: NWIRP/Grumman, Calverton, NY
RCRA Facility Investigation (RFI) Report
NYD003995198

Dear Mr. Colter:

The United States Environmental Protection Agency (EPA) has reviewed your August 24, 1995 response to comments on the RCRA Facility Investigation (RFI) Report for the Naval Weapons Industrial Reserve Plant (NWIRP), located in Calverton, New York, as well as the Final RFI Report. We conditionally approve the RFI Report provided that you agree with the following:

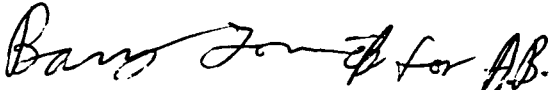
1. Site 1 (Northeast Pond Disposal Area) - One or more groundwater samples should be taken downgradient to and in close vicinity of Test Pit #22 to confirm whether or not the test pit has leached constituents to the groundwater at concentrations above regulatory levels. The wooded area to the east-northeast of Test Pit #22 appears to be an appropriate location for an additional monitoring well. However, the exact location of the sample(s) can be discussed prior to constructing the additional well(s). It is most pertinent to analyze these additional groundwater samples for trichloroethane and 2-methyl naphthalene, which were found at concentrations of 390 ppm and 370 ppm, respectively, at Sample NO. NPWST220405 in Test Pit #22.

After removal of the drum, which is allegedly the primary source of contamination at Test Pit #22, the soil beneath the drum should be sampled to confirm that all contamination has been removed. Any soil which is found to contain excessive levels of hazardous constituents should be removed.

2. Site 2 (Fire Training Area) - You should make a best effort attempt to acquire the funding for investigating the off-site contamination, as this is a high priority. In an August 29, 1995 telephone conversation between you and Ms. Carol Stein, of my staff, you had mentioned to Ms. Stein that your remaining budget for fiscal year 1995 includes funding for inspecting and visually investigating the adjacent property where groundwater contamination is expected to be present. My understanding is that you will conduct a preliminary assessment of the potential for an impact on this property due to contaminated groundwater and that you will evaluate the need for installing monitoring wells on the adjacent property. This proposal is generally acceptable, and we would be interested in reviewing any preliminary assessment document which you prepare regarding the adjacent property.
3. Site 7 (Fuel Depot Area) - In your response to NYSDEC's comment #8 regarding the referral of Site 7 to the NYSDEC Region 1 Oil Spills Program, you stated that "contamination at this site is only related to petroleum products which are not consisted [sic] to be hazardous substances as defined in the National Contingency Plan." You then recommended that this site should be exempt from possible inclusion under the CERCLA/RCRA hazardous substance response process. Please note that although we are in agreement with your referral of this site to the NYSDEC Oil Spills Program, this type of release normally would have been within the jurisdiction of the RCRA corrective action program if another program were not actively overseeing the remediation of this area. This is because petroleum hydrocarbons are considered hazardous constituents under RCRA corrective action. We reserve the right to resume future oversight authority of this area in the event that oversight priorities change for the NYS Oil Spills Program.

If you would like to discuss these comments with us, please contact Ms. Carol Stein, of my staff, at (212) 637-4181, before September 27, 1995.

Sincerely yours,



Andrew Bellina, P.E.
Chief, Hazardous Waste Facilities Branch

cc: Edwin Dassatti, NYSDEC